



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

November 28, 1997

CERTIFIED MAIL #P 875 705 140

Richard Hitchcock
Gem State Lumber Company
P.O. Box 379
Juliaetta, Idaho 83535

RE: Gem State Lumber Company (Juliaetta) - #9703-163-2
Tier II Operating Permit (#057-00007)

Dear Mr. Hitchcock:

On February 18, 1997, the Division of Environmental Quality (DEQ) received a Tier II Operating Permit (OP) application from Gem State Lumber's sawmill facility. On March 20, 1997, the application was determined complete. On October 3, 1997, a proposed Tier II OP was issued for public comment. The public comment period was held from October 15, 1997, through November 14, 1997. Comments were received from Gem State Lumber on November 3, 1997, and DEQ's responses are enclosed.

Based on review of your application, state and federal rules and regulations, DEQ finds this project meets the Provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Therefore, please find enclosed your Tier II OP (#057-00007) for the emission sources that exist at the facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

Please be advised that this operating permit is subject to permit application fees of five hundred dollars (\$500.00) in accordance with IDAPA 16.01.01.470. IDAPA 16.01.01.470 became effective on March 7, 1995. Information regarding the permit application fees will be sent to you shortly.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Susan J. Richards, Chief, Air Quality Permitting Bureau, at (208) 373-0502.


Sincerely,

Orville D. Green
Assistant Administrator
Air & Hazardous Waste

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Enclosures

cc: Lewiston Regional Office
Source File
COF

STATE OF IDAHO AIR POLLUTION OPERATING PERMIT		PERMIT NUMBER <div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">0</div> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">5</div> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">7</div> - <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">0</div> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">0</div> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">0</div> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">0</div> <div style="border: 1px solid black; padding: 2px; margin: 0 5px;">7</div> </div>		
GENERAL INFORMATION		AQCR <div style="border: 1px solid black; padding: 2px; display: inline-block;">0</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">6</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div>	CLASS <div style="border: 1px solid black; padding: 2px; display: inline-block;">A</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div>	SIC <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">4</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">1</div>
		ZONE <div style="border: 1px solid black; padding: 2px; display: inline-block;">1</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">1</div>	UTM COORDINATE (km) <div style="border: 1px solid black; padding: 2px; display: inline-block;">5</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">2</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">4</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">5</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">1</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">5</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">7</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">7</div>	
1. PERMITTEE Gem State Lumber Company				
2. PROJECT Tier II Operating Permit				
3. ADDRESS 1076 Highway 3		TELEPHONE # (208) 276-3401		COUNTY Latah
4. CITY Juliaetta		STATE Idaho		ZIP CODE 83535
5. PERSON TO CONTACT Richard Hitchcock		TITLE Owner		
6. EXACT PLANT LOCATION SW 1/4 sec.3 & SE 1/4 sec 4. T37N R3W BM				
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Lumber/Woodchips/Hogfuel and Wood Shavings				
8. GENERAL CONDITIONS This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit. THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION MADE AVAILABLE TO THE IDAHO DEPARTMENT OF HEALTH AND WELFARE, DIVISION OF ENVIRONMENTAL QUALITY (DEQ). CHANGES IN DESIGN, OPERATION, OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MUST BE APPROVED IN ADVANCE BY DEQ.				
 ASSISTANT ADMINISTRATOR DIVISION OF ENVIRONMENTAL QUALITY		ISSUED November 28, 1997 DATE EXPIRES November 28, 2002 DATE		

AIR POLLUTION OPERATING PERMIT

Permittee AND LOCATION

Gem State Lumber Company
Tier II Operating Permit
Juliaetta, Idaho

PERMIT NUMBER

057 - 00007

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Combustion Sources - Boilers

1. EMISSION LIMITS

1.1 Particulate Matter (PM)

1.1.1 The particulate matter (PM) emissions from each boiler stack shall not exceed 0.2 grains per dry standard cubic foot corrected to eight percent (8%) oxygen concentration. IDAPA 16.01.01.677

1.1.2 Emissions of particulate matter from each boiler stack shall not exceed any corresponding emission limit listed in Appendix A of this permit.

1.2 Carbon Monoxide (CO)

Emissions of Carbon Monoxide (CO) from each boiler stack shall not exceed any corresponding emission limit listed in Appendix A of this permit.

1.3 Visible Emissions

Visible emissions from each boiler stack shall not exceed twenty percent (20%) opacity over a period or periods aggregating more than three (3) minutes in any sixty (60) minute period in accordance with IDAPA 16.01.01.625. Opacity shall be determined using DEQ's "Procedures Manual for Air Pollution Control".

2. OPERATING REQUIREMENTS

The Permittee shall not operate either boiler in excess of 6,000 hours annually.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Operation Parameter Recordkeeping

The Permittee shall monitor and record each boiler's operating hours in a log to verify compliance with Section 2 of this permit. At a minimum the log shall have the monthly total operating hours and a summation for the most recent twelve (12) month period. The log shall be kept at the facility for the most recent two (2) years. The log shall be made available to DEQ representatives upon request.

3.1.1 Each boiler's operating hours shall be recorded on a monthly and a total for the year bases.

3.2 Exceedence Reporting of Operational Parameters

All excess emissions shall be handled in accordance with IDAPA Sections 130 through 136.

ISSUED: November 28, 1997
EXPIRES: November 28, 2002

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AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

Permittee AND LOCATION

Gem State Lumber Company
Tier II Operating Permit
Juliaetta, Idaho

057 - 00007

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Combustion Sources - Boilers

3.3 Source Test

Within two (2) years of the issuance of this permit, the Permittee shall conduct a performance test on each of the William's Dutch Oven Boiler Stacks using the methods outlined in 40 CFR 60.45c, or DEQ-approved alternative method to demonstrate compliance with the particulate matter emission limits in Section 1.1 of this permit. The Permittee shall also conduct a performance test on each of the William's Dutch Oven Boiler Stacks to demonstrate compliance with the carbon monoxide (CO) emission boiler limit in Section 1.2 of this permit. The CO performance test shall be performed in accordance with the test methods outlined in 40 CFR 60 Appendix A, Test Method 10, or DEQ-approved alternative method. Opacity shall be determined during the test using the procedures contained in the "Procedures Manual for Air Pollution Control". The fuel input to the boiler shall be monitored and recorded during the source tests. See General Provision H.

3.4 Certification of Documents

All documents, including, but not limited to, progress reports, records, monitoring data, supporting information requests for confidential treatment, testing reports, or compliance certifications shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. The certification shall provide the signature and title of the responsible official and the date of the signature.

ISSUED: November 28, 1997
EXPIRES: November 28, 2002

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AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

Permittee AND LOCATION

Gem State Lumber Company
Tier II Operating Permit
Juliaetta, Idaho

057 - 00007

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Kilns 2 Kilns

1. EMISSION LIMITS

1.1 Particulate Matter (PM)

Emissions of particulate matter (PM) from the exhaust vents of each kiln shall not exceed any corresponding emission limit listed in Appendix A of this permit.

1.2 Volatile Organic Compounds (VOC)

Emissions of volatile organic compounds (VOCs) from exhaust vents of each kiln shall not exceed any corresponding emission limit listed in Appendix A of this permit.

1.3 Visible Emissions

Visible emissions from each exhaust vent of each kiln shall not exceed twenty percent (20%) opacity over a period or periods aggregating more than three (3) minutes in any sixty (60) minute period in accordance with IDAPA 16.01.01.625. Opacity shall be determined using DEQ's "Procedure Manual for Air Pollution Control".

2. OPERATING REQUIREMENTS

The Permittee shall not operate either kiln in excess of 6,000 hours annually.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Operation Parameter Recordkeeping

The Permittee shall monitor and record each kiln's operating hours in a log to verify compliance with Section 2 of this permit. At a minimum the log shall have the monthly total operating hours and a summation for the most recent 12 month period. The log shall be kept at the facility for the most recent two (2) years. The log shall be made available to DEQ representatives upon request.

3.1.1 Each kiln's operating hours shall be recorded on a monthly and a total for the year bases.

3.2 Exceedence Reporting of Operational Parameters

All excess emissions shall be handled in accordance with IDAPA Sections 130 through 136.

3.3 Certification of Documents

All documents, including, but not limited to, progress reports, records, monitoring data, supporting information requests for confidential treatment, testing reports, or compliance certifications shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. The certification shall provide the signature and title of the responsible official and the date of the signature.

ISSUED: November 28, 1997
EXPIRES: November 28, 2002

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AIR POLLUTION OPERATING PERMIT

Permittee AND LOCATION

Gem State Lumber Company
Tier II Operating Permit
Julietta, Idaho

PERMIT NUMBER

057 - 00007

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Cyclones

1. EMISSION LIMITS

1.1 Particulate Matter (PM)

The particulate matter (PM) emissions from each cyclone exhaust shall not exceed any corresponding rate limit listed in Appendix A of this permit.

1.2 Visible Emissions

Visible emissions from each cyclone exhaust shall not exceed twenty percent (20%) opacity over a period or periods aggregating more than three (3) minutes in any sixty (60) minute period in accordance with IDAPA 16.01.01.625. Opacity shall be determined using DEQ's "Procedure Manual for Air Pollution Control".

2. OPERATING REQUIREMENTS

The Permittee shall not operate any cyclone in excess of 600 hours annually.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Operation Parameter Recordkeeping

The Permittee shall monitor and record each cyclone's operating hours in a log to verify compliance with Section 2 of this permit. At a minimum the log shall have the monthly total operating hours and a summation for the most recent 12 month period. The log shall be kept at the facility for the most recent two (2) years. The log shall be made available to DEQ representatives upon request.

3.1.1 Each cyclone's operating hours shall be recorded on a monthly and a total for the year bases.

3.2 Exceedence Reporting of Operational Parameters

All excess emissions shall be handled in accordance with IDAPA Sections 130 through 136.

3.3 Certification of Documents

All documents, including, but not limited to, progress reports, records, monitoring data, supporting information requests for confidential treatment, testing reports, or compliance certifications shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. The certification shall provide the signature and title of the responsible official and the date of the signature.

ISSUED: November 28, 1997
EXPIRES: November 28, 2002

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AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

Permittee AND LOCATION

Gem State Lumber Company
Tier II Operating Permit
Juliaetta, Idaho

057 - 00007

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Appendix A

APPENDIX A

GEM STATE LUMBER - JULIAETTE

HOURLY (lb/hr) and ANNUAL (T/yr) POINT SOURCE EMISSION LIMITS*

Source	PM		CO		NO _x		SO _x		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler #1 205 HP	7.9	23.8	11.9	35.7	0.4	1.3	0.1	0.2	0.2	0.7
Boiler #2 150 HP	5.8	17.4	8.7	26.1	0.3	0.9	0.1	0.2	0.2	0.5
Shaving Bin Cyclone	0.5	0.1								
Boiler Fuel Shavings Cyclone	0.5	0.1								
Dry Kiln #1	0.1	0.3							1.2	3.6
Dry Kiln #2	0.1	0.3							1.2	3.6

- a. As determined by a pollutant specific U.S. EPA reference method, DEQ approved alternative, or as determined by DEQ's emission estimation methods in the permit application analysis.

ISSUED: November 28, 1997
EXPIRES: November 28, 2002

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OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the **Rules for the Control of Air Pollution in Idaho**, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the **Rules for the Control of Air Pollution in Idaho**) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, **Idaho Code**, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

ISSUED: November 28, 1997
EXPIRES: November 28, 2002

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- I. The Permittee shall provide DEQ a minimum of thirty (30) days notice prior to the scheduled date of any performance test required pursuant to this permit. Such testing must strictly adhere to the procedures outlined in DEQ's **Procedures Manual for Air Pollution Control**, and will not be conducted on weekends or state holidays, unless the Permittee obtains prior DEQ approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment.

The Permittee shall promptly notify DEQ of any change in the testing schedule and shall provide at least five (5) working days notice prior to conducting any rescheduled test, unless DEQ approves a shorter advanced notice period. Any records or data generated as a result of such performance tests shall be made available to DEQ upon request.

The performance tests will be performed at the maximum production rate unless otherwise is specifically stated elsewhere in this Operating Permit. If this maximum rate is not achieved during testing, the allowable production rate will be limited to the production rate attained during testing.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.
- K. Operation information shall include daily and annual hours of operation and process throughput rate(s) as applied to development of permit conditions.

ISSUED: November 28, 1997 EXPIRES: November 28, 2002

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Response to Comments and Questions Submitted During a
Public Comment Period on Gem State Lumber Company
Proposed Tier II Operating Permit (OP) for the Entire Facility

I. INTRODUCTION

The public comment period on Gem State Lumber Company was held from October 15, 1997, through November 14, 1997.

Public comments which concern air quality aspects of the DEQ's proposed Operating Permit action have been summarized below. Each comment is followed by DEQ's response.

Comment #1: The Permittee disagrees with keeping a log of the operating time of the cyclones.

DEQ Response: The keeping of a log and the recording of the operating time of the cyclones is to demonstrate the facility is operating within the operational limits stated in the proposed Tier II operating permit. While the application requested operation of each cyclone at 417 hours and 0 (zero) hours per year respectively, the proposed Tier II allows for 600 hours per year for each cyclone, thus affording the facility greater operational flexibility.

Comment #2: Why am I required to do a performance test?

DEQ Response: The boilers in question were installed in 1930. The department does not have any performance record for these boilers. Since CO is the pollutant emitted in the greatest amount demonstration that CO is in fact below the emission threshold of 100 tons per year must be assured.

Comment #3: Why were the emission rates used in the proposed permit higher than those used in the application?

DEQ Response: The department has determined a priority ranking system for accepting emission factors. The hierarchy of origin is in this descending order:

1. Source testing (quality assured)
2. Manufacturer's guarantees--provided (operating and maintenance) conditions are met
3. Similar facility's source testing (quality assured)
4. AP-42 publication
5. Other state's published results for similar sources
6. Engineering estimates

Of the six categories above, only the AP-42 publication was used to estimate the boilers emissions in the application. It is the department's policy that if AP-42 emission estimates are used with a combustion unit, the facility has to provide documentation that the combustion unit adequately compares to the unit that produced the emission factor stated in AP-42. Neither the facility nor the consultant supplied this information with the application. Therefore an Engineering estimate was used for the determinations. Due to the age of the boiler (installed in 1930) this estimate was calculated by taking the average of the range provided in AP-42 to establish the limits in the proposed permit. Since the high end of the range was not used to establish the emission limit for CO, a source test is required to demonstrate compliance.

Instead of a source test the facility could request a reduction in the hours of operation and use the worst case emission factor from AP-42 to determine the operational limits.

The above mentioned alternative is one possible option the facility could use to address the question of concern. Which ever method Gem State Lumber chooses will receive the proper attention and evaluation of the department.

Comment #4: If the emissions are lower for CO, then Gem State Lumber would like to request more operating hours per year.

DEQ Response: If the facility performs an approved source test which measures the CO emission rate below that in the permit, the facility may request a modification to increase the allowable hours of operation.



GEM STATE LUMBER

October 30, 1997

RECEIVED

NOV 03 1997

Chris Davenport
Division of Environmental Quality
1410 North Hilton
Boise, Idaho, 83706-1255

DIV. OF ENVIRONMENTAL QUALITY
AIR & HAZARDOUS WASTE

RE: Gem State Lumber Company Proposed Tier II Operating Permit

Dear Mr. Davenport,

Mr. Baldwin has advised me that any response to the Operating Permit be made to you. As you are the coordinator for this Permit. After looking through the proposed permit I have a few questions.

1. It was discussed with Mr. Baldwin that a log be kept on the operating hours for both the #1 Boiler & the #2 Boiler. This log would be located at the Boiler House and documented by the head Fireman. It was not discussed having a log for the cyclones and I disagree with keeping a log for them.
2. In reference to the performance testing of carbon monoxide. I have found that none of the other Mills in the are required to do performance testing for carbon monoxide. I would like to know why I am required to do so.
3. I do not understand why in the application I submitted, we used AP-42 for reference and used 6.75 lbs/hrs of CO for the #1 Boiler and 4.94 lbs/hrs of CO for the # 2 Boiler. The total being 11.69 lbs/hrs of CO for both Boilers combined. On the proposed permit that I was sent it is stated that AP-42 was used as a reference and the total for both Boilers is 20.6 lbs/hrs. Please explain the difference.
4. If the emissions are lower for CO than Gem State Lumber Company would like to request more operating hours per year.

I have no further questions at this time. Please fill free to call on any of these items.

Sincerely,

Richard A Hitchcock